

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PHILIP CAGGIANO,

Plaintiff,

v.

STEWARD CARNEY HOSPITAL, INC.,
STEWARD HEALTHCARE SYSTEM LLC,
STAN MCLAREN, MARK RICH, RALPH
DE LA TORRE, and PATRICK
LOMBARDO,

Defendants.

Docket #: _____

DECLARATION OF CANDICE WRIGHT IN SUPPORT OF REMOVAL

I, Candice Wright, declare:

1. I am Vice President, Human Resources for Steward Health Care System LLC (“Steward HC”), which is the parent corporation of defendant Steward Carney Hospital, Inc. (“Steward Carney”) (collectively “Steward”).

2. I make this affidavit upon personal knowledge and upon personal review of records of Steward which are kept in the ordinary course of its business and which are attached to Steward’s *Notice Of Removal*.

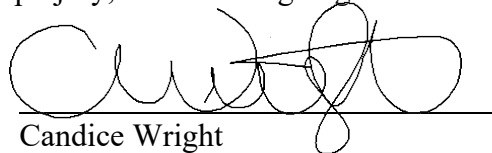
3. **Exhibit D** to Steward’s *Notice Of Removal* is a true copy of a Steward HC business record (HR system printout) that I downloaded showing that Mr. Caggiano held the position “Inventory Specialist” at the time of Steward Carney’s closure in or around August 2024.

4. **Exhibit E** to Steward's *Notice Of Removal* is a true copy of the Collective Bargaining Agreement between Steward HC and 1199SEIU UNITED HEALTHCARE WORKERS EAST ("the CBA") effective from November 1, 2019 to October 31, 2024.

5. **Exhibit F** to Steward's *Notice Of Removal* is a true copy of Steward HC business records (i.e., "Earnings History Detail") for Mr. Caggiano for the last three payments Steward made to him at or around the time of Steward Carney's closure and Mr. Caggiano's being laid off.

6. **Exhibit F** (and Steward's online payroll records) indicate that Steward paid Mr. Caggiano all of his accrued PTO at the time of his termination from employment (i.e., Steward Carney's closing).

I, Candice Wright, hereby declare, under penalty of perjury, that the foregoing is true and correct.



Candice Wright

Executed on March 12, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system, which will send electronic copies to the registered participants identified on the Notice of Electronic Filing, and that I have sent copies of this document via email to individuals listed as nonregistered participants (if any) on March 12, 2025, including plaintiff's attorney:

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/s/ Michael P. Twohig
Michael P. Twohig